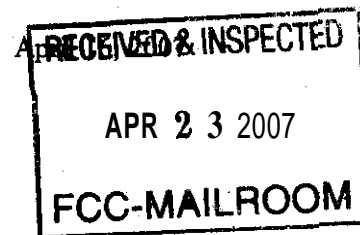


Frances Lamberts, 113 Ridge Lane, Jonesborough, TN 37659

The Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554



Proceeding Number 03-187

Proposed rulemaking: bird **collisions** with communications towers

Dear Secretary, FCC:

Being a user of TV and various ~~data~~ and communication devices, I ~~am~~ saddened to learn that the cell towers needed for these convenient and ~~useful~~ modem services ~~are~~ a great menace to our birds. This should not be. Surely, one may assume, we can apply ourselves to this problem, through tower lighting less likely to attract birds, particularly during their night ~~flying~~.

I ~~am~~ therefore very glad of the Commission's proposal to change the tower-lighting requirements toward that end. I support the orooosal wholeheartedly, and ~~thank you for seeking public input on~~ the matter.

As I understand your rulemaking notice and its various sections, (e.g. "Possible Commission Actions"), new white strobe lighting is being recommended as "preferred" over the current lighting arrangements, and that new or altered antenna structures should use these, if safe for ~~navigation~~ as determined by the FAA. I would like to see the Commission make this a binding requirement, not merely ~~preferred~~, and to see it being applied to present antenna towers as well, not ~~future towers~~ only. I.e. not incidental tower altering should set the occasion for switching to bird-safer lighting hut, instead, requiring the lighting changes would accomplish the necessary alteration. A reasonable but short implementation period for these alterations should be set, which modification can presumably be carried out within the context of periodic operational ~~maintenance~~ work on towers.

It would appear advisable to me that a Programmatic Environmental Impact Statement be undertaken, especially if communication towers are to be ~~located~~ near or in urban residential neighborhoods. Not only social-esthetic and possible, human performance impacts of ~~different lighting systems~~ could be assessed ~~within a PEIS but also~~ the effects on birds in urban settings. Indeed, such a study encompassing many aspects of tower siting, height, lights, surroundings and other variables would ~~seem~~ desirable, as their numbers are likely to increase and as they are cause of such great bird mortality, ~~as~~ currently ~~con~~structed and operated.

In similar vein, other study aspects mentioned or intimated in the Notice (e.g. III.B.7) should be pursued vigorously. The "public," I ~~am~~ sure, very much wants to ~~see~~ technologies explored and put in place that have no or few unintentional, damaging effects on our landscapes and wildlife. We should know which features of lights, or tower ~~design/materials~~ or other aspects give the best outcome (=fewest bird collisions). Scientific research will provide needed answers; it should be ongoing or, if not, instituted and supported to speedy effect.

As a green-power subscriber and having followed the outcome of the TVA's bird-fatality monitoring on the, Buffalo Mountain wind farm, I support a general requirement of freestanding instead of guy-wire supported towers, where ~~this can~~ reasonably be accomplished. If and where it can not, the need for comparative-preventive research for less avian risk from wires raises itself, and best current recommendations for safety of tower and

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birds should be required to be put into effect

Regarding tower siting and environmental assessment, I strongly support that the latter be performed and brought before the public, and that minimization/avoidance of siting in the most-traveled flyways be sought. Since so many bird species already are in perilous decline, even facing extinction risk, environmental assessment should be a routine part of permitting/registration procedures for future towers. These should also include active bird-fatality monitoring and reporting, **so that** better circumstances to protect wildlife from unintended harm *can* be devised in the future;

As Theodore Roosevelt ~~used~~ to say, “Birds of all kinds add by voice **and** action to ~~the~~ joy of living of most men and women,” be ~~they~~ the “homely birds of farm and lawn” or the neotropical larks, thrushes and other “admirable singers” whose “rapture of ringing melody” he so **often** wrote of. I encourage and urge the Commission to advance the proposed measures, and strengthen them if possible, to help assure that enjoyment—and ecological utility—of our native bird life will not **be** lost to our children.

Again, I thank the Commission for seeking public input. Thank you for considering my comments

Sincerely,

A handwritten signature in black ink, appearing to read 'Frances Lamberts', written in a cursive style.

Frances Lamberts, Ed.D.